

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

**IN RE: JOHNSON & JOHNSON TALCUM  
POWDER PRODUCTS MARKETING, SALES  
PRACTICES, AND PRODUCTS LIABILITY  
LITIGATION**

ISHMAEL CALBERT, individually and as Personal  
Representative of the Estate of MILLICENT D. REID,

Plaintiff,

v.

JOHNSON & JOHNSON, and JOHNSON &  
JOHNSON CONSUMER INC.,

Defendants.

**MDL No. 2738 (FLW) (LHG)  
JUDGE FREDA L. WOLFSON  
MAG. JUDGE LOIS H. GOODMAN**

COMPLAINT AND JURY DEMAND

Civil Action No: 3:19-cv-16863

DIRECT FILED ACTION

**NOTICE OF FILING**

Notice is hereby given pursuant to Case Management Order No. 3 (Filing of Short Form Complaints) that a Short Form Complaint and Jury Demand was filed in the above-referenced case on August 20, 2019 on behalf of Ishmael Calbert, individually and as Personal Representative of the Estate of Millicent D. Reid.

Dated: September 6, 2019

Respectfully submitted:



MICHAEL GOETZ, ESQUIRE  
Florida Bar No. 963984  
Morgan & Morgan  
Complex Litigation Group  
One Tampa City Center, 7<sup>th</sup> Floor  
201 N. Franklin Street  
Tampa, Florida 33602  
Telephone (813) 223-5505  
Facsimile (813) 223-5402  
E-Mail: [MGoetz@forthepeople.com](mailto:MGoetz@forthepeople.com)  
Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served on all parties of record via the District of New Jersey electronic filing system September 6, 2019.

/s/ Michael Goetz  
Attorney for Plaintiff